

DAVID L. ANDERSON (CABN 149604)  
United States Attorney

HALLIE HOFFMAN (CABN 210020)  
Chief, Criminal Division

ROBERT S. LEACH (CABN 196191)  
Assistant United States Attorney

1301 Clay Street, Suite 340S  
Oakland, California 94612  
Telephone: (510) 637-3680  
Fax: (510) 637-3724  
Email: Robert.Leach@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	Case No. CR 18-577 CRB
	)	
Plaintiff,	)	STIPULATION AND [PROPOSED] ORDER
	)	
v.	)	
	)	
STEPHEN KEITH CHAMBERLAIN,	)	
	)	
Defendant.	)	
	)	
	)	

**STIPULATION**

WHEREAS, on November 29, 2018, the Grand Jury returned an Indictment against Stephen Keith Chamberlain, a resident of the United Kingdom;

WHEREAS, on February 4, 2019, defendant Chamberlain (“the defendant”) appeared before the Court (with counsel specially appearing), was arraigned on the Indictment, and pleaded not guilty to all counts;

WHEREAS, on March 21, 2019, the Grand Jury returned a Superseding Indictment against Chamberlain [ECF No. 21];

WHEREAS, on April 2, 2019, the Court conducted a status conference in this matter, during which the defendant was arraigned on the Superseding Indictment, the defendant pleaded not guilty to

STIPULATION AND [PROPOSED] ORDER  
CASE NO. CR 18-577 CRB

all counts, the Court in camera addressed issues regarding representation of counsel with the defendant, and the Court continued the matter to July 10, 2019, at 1:30 p.m., and ultimately to July 18, 2019 [ECF Nos. 23, 31, 32, 34, 35];

WHEREAS, the parties have conferred and respectfully request that the Court continue the July 18, 2019 status conference to September 25, 2019, at 1:30 p.m.;

WHEREAS, the parties stipulate and agree that an exclusion of time under the Speedy Trial Act, from July 17, 2019, to September 25, 2019, is appropriate due to the complexity of the case, the need for continuity of counsel, and the need for defense counsel to review relevant evidence, consult with the defendant in the United States, and effectively prepare;

THEREFORE, the parties stipulate and agree, and respectfully request that the Court order, that the status conference currently scheduled for July 18, 2019, be continued to September 25, 2019, at 1:30 p.m. The parties stipulate and agree that excluding time from July 17, 2019, to September 25, 2019, will allow for the continuity of counsel and the effective preparation of counsel given the complexity of the case. *See* 18 U.S.C. § 3161(h)(7)(B)(ii) & (iv). The parties further stipulate and agree that the ends of justice served by excluding the time from July 17, 2019, to September 25, 2019, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(ii) & (iv). The parties further stipulate and agree the Court shall enter the proposed order below.

IT IS SO STIPULATED.

DATED: July 16, 2019

DAVID L. ANDERSON  
United States Attorney

/s/

ROBERT S. LEACH  
Assistant United States Attorney

DATED: July 16, 2019

BIRD, MARELLA, BOXER, WOLPERT,  
NESSIM, DROOKS, LINCENBERG, & RHOW,  
P.C.

/s/

GARY S. LINCENBERG  
Attorneys for Defendant Stephen Chamberlain

**[PROPOSED] ORDER**

Based upon the facts set forth in the stipulation of the parties and the representations made to the Court, and for good cause shown, the status conference currently scheduled for July 18, 2019, shall be continued to September 25, 2019, at 1:30 p.m. The Court finds that failing to exclude the time from July 17, 2019, to September 25, 2019, would unreasonably deny the defendant continuity of counsel and defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence and the complexity of the case. 18 U.S.C. § 3161(h)(7)(B)(ii) & (iv). The Court further finds that the ends of justice served by excluding the time from July 17, 2019, to September 25, 2019, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from July 17, 2019, to September 25, 2019, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(ii) & (iv).

IT IS SO ORDERED.

DATED:

---

THE HONORABLE CHARLES R. BREYER  
United States District Judge